

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**NOTICE OF TWELFTH AND FINAL APPLICATION OF STINSON LLP FOR  
ALLOWANCE OF FEES AND EXPENSES AS COUNSEL  
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FROM JULY 1, 2025, THROUGH AUGUST 20, 2025**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

1. **NOTICE IS HEREBY GIVEN** that Stinson LLP, as counsel for the Official Committee of Unsecured Creditors, has filed its twelfth and final application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **October 8, 2025, which is twenty-one (21) days from the date of the filing of this Notice, excluding holidays**. Any objections not filed and served may deemed waived.

Dated: September 17, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)  
Christopher J. Harayda (MN #0390333)  
Samantha J. Hanson-Lenn (MN #0402035)  
**STINSON LLP**  
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**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

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Chapter 11

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**TWELFTH AND FINAL APPLICATION OF STINSON LLP FOR ALLOWANCE OF  
FEES AND EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FROM JULY 1, 2025, THROUGH AUGUST 20, 2025**

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1. Stinson LLP ("Stinson") makes this Twelfth and Final Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as counsel for the Official Committee of Unsecured Creditors (the "Committee") of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the "Debtors") pursuant to 11 U.S.C. § 330.

2. In support of this Application, Stinson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the "Petition Date"). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, 331, and 1103. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application

is provided pursuant to the Federal Rules of Bankruptcy Procedure, the Notice and Service Requirements adopted pursuant to Local R. 2002-1, and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

### **BACKGROUND**

5. On July 30, 2024, the Office of the United States Trustee appointed the Committee. [Dkt. No. 58.]

6. On August 7, 2024, the Committee selected Stinson to serve as its bankruptcy counsel, subject to court approval. On August 13, 2024, the Committee filed the Application to Employ Stinson LLP as Counsel to the Official Committee of Unsecured Creditors (the "Application to Employ"). [Dkt. No. 69.] The Court granted the Application to Employ, effective August 7, 2024, on August 30, 2024, via docket text (the "Order Approving Application to Employ"). [Dkt. No. 101.] A copy of the Order Approving Application to Employ is attached as **Exhibit A**.

7. Pursuant to the Order Approving the Application to Employ, the Court also granted Stinson the authority to apply for fees and expenses pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals (the "Order Establishing Fee Application Procedures") [Dkt. No. 72]. The Order Establishing Fee Application Procedures is attached as **Exhibit B**.

8. This is Stinson's twelfth application for compensation under 11 U.S.C. § 331. Stinson's filed its first application on September 16, 2024 (the "First Application"); its second application on November 7, 2024 (the "Second Application"); its third application on December 2, 2024 (the "Third Application"); its fourth application on December 30, 2024 (the "Fourth Application"); its fifth application on February 6, 2025 (the "Fifth Application"); its sixth

application on February 25, 2025 (the “Sixth Application”); its seventh application on April 4, 2025 (the “Seventh Application”); its eighth application on May 2, 2025 (the “Eighth Application”); its ninth application on June 2, 2025 (the “Ninth Application”); its tenth application on June 25, 2025 (the “Tenth Application”); its eleventh application on July 31, 2025 (the “Eleventh Application”). [Dkt. Nos. 109, 160, 179, 202, 219, 237, 265, 282, 333, 392, and 421.]

9. The Court has approved all eleven Applications as follows: 1) for the First Application, the Court approved \$42,776.50 in fees and \$1,953.04 in expenses for a total of \$44,729.54 on October 21, 2024; 2) for the Second Application, the Court approved \$40,957.50 in fees and \$2,661.88 in expenses for a total of \$43,619.38 on December 4, 2024; 3) for the Third Application, the Court approved \$11,882.00 in fees on December 27, 2024; 4) for the Fourth Application, the Court approved \$16,105.50 in fees on January 27, 2025; 5) for the Fifth Application, the Court approved \$6,188.50 in fees on March 4, 2025; 6) for the Sixth Application, the Court approved \$18,631.50 in fees on March 25, 2025; 7) for the Seventh Application the Court approved \$16,390.50 in fees on May 1, 2025; and 8) for the Eighth Application the Court approved \$19,036.50 in fees and \$570.25 in expenses for a total of \$19,606.75 on May 28, 2025; 9) for the Ninth Application the Court approved \$8,734.50 in fees on June 24, 2025; 10) for the Tenth Application the Court approved \$10,285.50 in fees on July 17, 2025; for the Eleventh Application, the Court approved \$20,750.50 in fees and \$2,021.74 in expenses for a total of \$22,772.24. [Dkt. Nos. 149, 181, 201, 217, 239, 264, 279, 327, 389, 403, and 455.]

10. The total amount of fees and expenses approved by the Court for the First through Eleventh Applications is \$218,945.91.

**RELIEF REQUESTED**

1. **Fees and Expenses.** By this Application, Stinson requests allowance of fees for professional services rendered during Debtors' Chapter 11 cases between July 1, 2025, to August 20, 2025, in the amount of **\$24,956.00**, and reimbursement of expenses in the amount of **\$0**, for a total of **\$24,956.00**.

2. The professional services rendered by Stinson are detailed on the attached **Exhibit**

**C.** Those services include the tasks specifically described below:

**(Task Code: B100 and B110) Case Administration: \$541.00**

Services include reviewing and analyzing court filings, including the monthly operating reports and coordination of transition of post-confirmation trust agreement.

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Year</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Fees</u></b>
Benjamin J. Court	0.5	2025	\$565	\$282.50
Christopher J. Harayda	0.3	2025	\$565	\$169.50
Samantha J. Hanson-Lenn	0.2	2025	\$445	\$89.00
<b>TOTAL</b>	1.00			<b>\$541.00</b>

Blended Hourly Rate:	\$541.00
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**(Task Code: B120) Asset Analysis and Recovery: \$3,723.50**

Services include collection and enforcement strategies and efforts for pending adversary proceedings and possible adversary proceedings; Communications with the CRO and debtor's counsel regarding status of adversary proceedings and settlements; Reviewing and tracking adversary proceedings status; Attending summary judgment hearing on multiple adversary proceedings.

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Year</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Fees</u></b>
Benjamin J. Court	1.5	2025	\$565	\$847.50
Christopher J. Harayda	1.1	2025	\$565	\$621.50
Samantha J. Hanson-Lenn	4.8	2025	\$445	\$2,136.00
Shelby E. Kostolni	0.3	2025	\$395	\$118.50
<b>TOTAL</b>	7.7			<b>\$3,723.50</b>

Blended Hourly Rate:	\$483.57
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**(Task Code B150) Meetings of and Communications with Creditors: \$4,629.50**

Services include participating in various conferences with the Committee to evaluate and provide advice regarding Chapter 11 Plan and Debtors' recovery options, settlements, and post-confirmation next steps; reviewing and responding to various questions from creditors regarding Chapter 11 Plan and voting; engaging in various communications via email and phone with creditors regarding the status of case, bankruptcy process, and new filings in the case.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	3.9	2025	\$565	\$2,203.50
Samantha J. Hanson-Lenn	4.5	2025	\$445	\$2,002.50
Miranda S. Swift	1.1	2025	\$385	\$423.50
<b>TOTAL</b>	<b>9.5</b>			<b>\$4,629.50</b>

Blended Hourly Rate:	\$503.21
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**(B160 and 170) Employment Applications and Fee Applications: \$1,306.00**

Services include preparing Fee Applications and evaluating issues regarding Fee Applications.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	0.5	2025	\$565	\$282.50
Samantha J. Hanson-Lenn	2.3	2025	\$445	\$1,023.50
<b>TOTAL</b>	<b>2.8</b>			<b>\$1,306.00</b>

Blended Hourly Rate:	\$446.43
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**(B190) Other Contested Matters: \$2,602.00**

Services include reviewing updated pleadings in adversary proceedings and analyzing issues regarding defenses in adversary proceedings; and preparing summary of adversary proceedings and settlements for Committee.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Christopher J. Harayda	2.4	2025	\$565	\$1,356.00
Samantha J. Hanson-Lenn	2.8	2025	\$445	\$1,246.00
<b>TOTAL</b>	<b>5.2</b>			<b>\$2,602.00</b>

Blended Hourly Rate:	\$500.38
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**(B300 and B310) Claims Administration: \$270.50**

Services include reviewing claims transfers and updating the Committee.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Shelby E. Kostolni	0.5	2025	\$395	\$270.50
<b>TOTAL</b>	<b>0.2</b>			<b>\$270.50</b>

Blended Hourly Rate:	\$395.00
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**(B300 and B320) Plan/Disclosure Statement Incl. Bus Plan: \$11,956.50**

Communicating with and providing advice to Committee regarding Disclosure Statement, Plan confirmation issues, and next steps following confirmation; Communicating with Debtors' counsel regarding Disclosure Statement, Plan, voting, Plan confirmation, and next steps following confirmation; Communicating with creditors regarding ballots and voting; Analyzing voting procedures; Preparing Committee's Response in Support of the Plan; Analyzing confirmed plan in preparation for trust transition.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	2.6	2025	\$565	\$1,469.00
Christopher J. Harayda	13.6	2025	\$565	\$7,684.00
Miranda S. Swift	6.3	2025	\$385	\$2,803.50
<b>TOTAL</b>	<b>22.5</b>			<b>\$11,956.50</b>

Blended Hourly Rate:	\$531.40
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**TOTAL FEES: \$24,956.00**

3. **Reimbursement of Expenses.** In the course of this representation, Stinson has incurred \$0 in expenses detailed in **Exhibit C.**

**TOTAL EXPENSES: \$0**

4. All services for which fees are requested by Stinson were performed for and on behalf of the Committee, and not on behalf of the Debtors or other persons.

**LEGAL BASIS**

5. This Court is authorized to award to professional persons employed by section 1103



of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered by the ... attorney[s] and by any paraprofessional person[s] employed by any such person, and ... reimbursement for actual, necessary expenses.” 11 U.S.C. § 330. The Court must consider the nature, extent, and value of such services, taking into account all relevant factors to determine whether the request for payment in connection with such services is fair and reasonable. *Id.* The services Stinson provided pursuant to this Twelfth Application were actual, reasonable, and necessary services on behalf of the Committee, and not on the behalf of any other persons, and the fees and expenses requested in this Application are fair and reasonable under the circumstances of this case.

**WHEREFORE**, Stinson respectfully requests that the Court enter an order:

A. Allowing Stinson’s fees incurred between July 1, 2025, and August 20, 2025, in the amount of **\$24,956.00**, and reimbursement of expenses in the amount of **\$0**, for a total of **\$24,956.00**.

B. Authorizing and directing the Debtors to pay Stinson such allowed fees and expenses;

C. Granting administrative expense priority to Stinson’s allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: September 17, 2025

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)  
Christopher J. Harayda (MN #0390333)  
Samantha J. Hanson-Lenn (MN #0402035)  
**STINSON LLP**  
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samantha.hansonlenn@stinson.com

**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**

**AFFIDAVIT**

I, Benjamin J. Court, an attorney at the law firm of Stinson LLP, declare under penalty of perjury that the foregoing Twelfth and Final Application of Stinson LLP for Allowance of Fees and Expenses as counsel for the Official Committee of Unsecured Creditors from July 1, 2025, through August 20, 2025, is true and correct according to the best of my knowledge, information, and belief.

Dated: September 17, 2025

/s/ Benjamin J. Court  
Benjamin J. Court

## **EXHIBIT A**

**Docket Text:**

Order Approving Application to Employ Benjamin J. Court and Stinson LLP as counsel for the Official Committee of Unsecured Creditors Effective August 7, 2024 (Related Doc # [69]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 08/30/2024 (vck)

## **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
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Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT



## **EXHIBIT C**

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43658405

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Benjamin Court	Partner	565.00	9.00	5,085.00
C.J. Harayda	Partner	565.00	17.40	9,831.00
Miranda Swift	Associate	385.00	1.10	423.50
Samantha Hanson-Lenn	Associate	445.00	20.90	9,300.50
Shelby Kostolni	Associate	395.00	0.80	316.00
<b>Current Professional Services</b>			<b>49.20</b>	<b>\$24,956.00</b>

**Professional Services**

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>B110 - Case Administration</b>				
07/21/25	B110	Review and analyze monthly operating reports and prepare summary regarding the same. Samantha Hanson-Lenn	0.20	89.00
08/15/25	B110	Evaluate and strategize regarding post-confirmation litigation and enforcement issues. Benjamin Court	0.30	169.50
08/20/25	B110	Exchange emails with liquidating trustee regarding post-confirmation issues and litigation strategy. Benjamin Court	0.20	113.00
08/20/25	B110	Analyze issues regarding trust agreement and pursuit of causes of action (.2); comms with P. Finn re same (.1). C.J. Harayda	0.30	169.50
<b>Total B110 - Case Administration</b>			<b>1.00</b>	<b>541.00</b>
<b>B120 - Asset Analysis and Recovery</b>				
07/10/25	B120	Phone conference with debtor's counsel, CRO, and Hain Capital to address status of note collection and enforcement efforts and proposed next steps. Benjamin Court	1.00	565.00
07/10/25	B120	Prepare for and meeting with CRO, debtors counsel and creditor group regarding status of pending actions and	1.10	621.50

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43658405

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		plan (1.0); follow-up with committee regarding same (.1). C.J. Harayda		
07/10/25	B120	Review motion to approve settlement and update internal documents. Shelby Kostolni	0.30	118.50
07/21/25	B120	Review and analyze progress in adversary proceedings and update internal tracking of adversary proceedings. Samantha Hanson-Lenn	0.50	222.50
07/21/25	B120	Review summary judgment hearing date and analysis regarding cases to be heard on August 7, 2025 and docket date. Samantha Hanson-Lenn	0.10	44.50
08/06/25	B120	Review and analyze confirmation order (.3); phone conference with counsel for multiple creditors regarding confirmation and subsequent enforcement issues (.2). Benjamin Court	0.50	282.50
08/07/25	B120	Prepare for and attend summary judgment hearing for adversary proceedings. Samantha Hanson-Lenn	2.10	934.50
08/14/25	B120	Prepare summary of meeting to Ben Court and CJ Harayda regarding strategy for post effective date for adversary cases and possible causes of action. Samantha Hanson-Lenn	0.50	222.50
08/14/25	B120	Review and analyze Trust Agreement and strategy regarding post effective date actions. Samantha Hanson-Lenn	0.80	356.00
08/14/25	B120	Strategize possible future actions against individuals and time line and next steps. Samantha Hanson-Lenn	0.40	178.00
08/14/25	B120	Analysis regarding immediate actions after trust is effective. Samantha Hanson-Lenn	0.20	89.00
08/19/25	B120	Analysis regarding adversary proceedings status and memorandum to file regarding the same. Samantha Hanson-Lenn	0.20	89.00

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>Total B120 - Asset Analysis and Recovery</b>			<b>7.70</b>	<b>3,723.50</b>
<b>B150 - Meetings of and Comm. with Creditors</b>				
07/02/25	B150	Phone conference with creditor Gene Rode regarding questions on plan and the ballot. Samantha Hanson-Lenn	0.50	222.50
07/07/25	B150	Phone conference with creditor regarding passing of creditor wife. Samantha Hanson-Lenn	0.10	44.50
07/09/25	B150	Review several emails from unsecured creditor Langseth and prepare responses. Samantha Hanson-Lenn	0.50	222.50
07/09/25	B150	Review several emails from unsecured creditor Nowak regarding Plan and voting and prepare responses. Samantha Hanson-Lenn	0.70	311.50
07/11/25	B150	Phone conference with creditor Travis regarding ballot questions. Samantha Hanson-Lenn	0.20	89.00
07/14/25	B150	Correspondence regarding Mr. Weisenburger's claims. Miranda Swift	0.40	154.00
07/14/25	B150	Analyze Proposed Plan and Order regarding objection deadline and ballots and prepare response to creditor regarding voting and plan confirmation procedures. Samantha Hanson-Lenn	1.00	445.00
07/15/25	B150	Exchange emails with creditor regarding ballot submission questions. Benjamin Court	0.20	113.00
07/15/25	B150	Correspondence with Mr. Weisenburger regarding plan ballots. Miranda Swift	0.20	77.00
07/15/25	B150	Phone conference with creditor Barry Olson regarding voting procedures. Samantha Hanson-Lenn	0.20	89.00
07/16/25	B150	Exchange emails with debtors' counsel regarding ballot issues and messaging to creditor group (0.3); address plan response, service of response on all creditors, and	1.10	621.50

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43658405

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		plan confirmation messaging to creditor group (0.3); prepare revisions to committee response supporting plan (0.5). Benjamin Court		
07/16/25	B150	Research Ms. Langseth's claims and telephone call regarding same. Miranda Swift	0.50	192.50
07/21/25	B150	Exchange emails with creditors regarding questions concerning ballots and votes (0.4); phone conference with committee members, debtor's CRO, and debtors' counsel to address the status of various pieces of litigation and workouts with project entities (1.3). Benjamin Court	1.70	960.50
07/21/25	B150	Phone conference with creditors Latisha and Larry regarding voting process. Samantha Hanson-Lenn	0.10	44.50
07/21/25	B150	Prepare correspondence to all unsecured creditors regarding voting procedures. Samantha Hanson-Lenn	0.20	89.00
07/22/25	B150	Revise correspondence to unsecured creditors regarding voting process and analysis regarding timing. Samantha Hanson-Lenn	0.30	133.50
08/14/25	B150	Prepare email to committee regarding status of case and post effective strategy. Samantha Hanson-Lenn	0.70	311.50
08/18/25	B150	Attend phone conference with members of the unsecured creditor's committee/liquidating trust committee to explain post-confirmation steps, recovery strategy, and related matters. Benjamin Court	0.90	508.50
<b>Total B150 - Meetings of and Comm. with Creditors</b>			<b>9.50</b>	<b>4,629.50</b>
<b>B160 - Fee/Employment Applications</b>				
07/16/25	B160	Begin Preparation of June Fee Application. Samantha Hanson-Lenn	0.20	89.00

**Stinson LLP**

**Invoice Detail**

File No. 3531668.0002

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Invoice No: 43658405

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
07/22/25	B160	Prepare Application for Compensation and compile exhibits. Samantha Hanson-Lenn	1.50	667.50
07/30/25	B160	Prepare revisions to fee application and exchange emails regarding same. Benjamin Court	0.50	282.50
07/31/25	B160	Update and revise fee application. Samantha Hanson-Lenn	0.40	178.00
08/20/25	B160	Begin preparing fee application for July. Samantha Hanson-Lenn	0.20	89.00
<b>Total B160 - Fee/Employment Applications</b>			<b>2.80</b>	<b>1,306.00</b>

**B190 - Other Contested Matters**

07/08/25	B190	Review docket and incoming filings and analyze settlement. Samantha Hanson-Lenn	0.10	44.50
07/10/25	B190	Review docket and update adversary proceeding and settlement tracking sheet and analysis in preparation for committee meeting with CRO. Samantha Hanson-Lenn	1.20	534.00
07/21/25	B190	Review and update adversary tracker for UCC (.4); prepare for and conference with debtors counsel, CRO and UCC (1.2); analyze email to creditors regarding response in support of plan (.2); draft and revise correspondence regarding balloting methods (.1); communications with S. Kinsella regarding same (.2). C.J. Harayda	2.10	1,186.50
07/22/25	B190	Analyze issues related to upcoming hearings, including MSJ in multiple adversary proceedings. C.J. Harayda	0.30	169.50
08/07/25	B190	Prepare summary of Court's denial for summary judgment in adversary proceedings for committee and strategy regarding the same. Samantha Hanson-Lenn	1.50	667.50

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>Total B190 - Other Contested Matters</b>			<b>5.20</b>	<b>2,602.00</b>
<b>B300 - Claims and Plan</b>				
08/01/25	B300	Review and analysis regarding ballot computation and interoffice memorandum regarding the same. Samantha Hanson-Lenn	0.10	44.50
08/06/25	B300	Review updates regarding confirmation of plan (.3); communications with Stinson team regarding confirmation hearing attendance and remote appearances (.1). C.J. Harayda	0.40	226.00
<b>Total B300 - Claims and Plan</b>			<b>0.50</b>	<b>270.50</b>
<b>B310 - Claims Administration and Objections</b>				
08/11/25	B310	Review and summarize recent claims transfers in debtors' cases. Shelby Kostolni	0.50	197.50
<b>Total B310 - Claims Administration and Objections</b>			<b>0.50</b>	<b>197.50</b>
<b>B320 - Plan/Disclosure Statement Incl. Bus Plan</b>				
07/01/25	B320	Prepare for and participate in call with creditors regarding plan and trust (1.0); follow-up with committee regarding same (.3); analyze issues regarding plan solicitation and response (.5). C.J. Harayda	1.80	1,017.00
07/14/25	B320	Exchange emails with creditor regarding ballot and voting issues (.2); phone conference with debtors' counsel regarding ballot mailing and electronic submission issues (.3); follow up on ballot and delivery questions raised by creditors and review order and disclosure statement regarding same (.4). Benjamin Court	0.90	508.50
07/14/25	B320	Review and analyze questions from creditors regarding	0.80	452.00

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		various issues related to plan and balloting (.2); review and revise responses to same (.2); analyze issues with ballot submission (.2); review and update response to questions on voting (.1); review updated tracker on adversary proceedings and organize meeting regarding same (.1) C.J. Harayda		
07/14/25	B320	Analyze Amended Disclosure Statement and Amended Chapter 11 Plan of Liquidation. Samantha Hanson-Lenn	0.10	44.50
07/14/25	B320	Analysis of voting procedures and possible issues for voting in regards to creditor's questions on voting. Samantha Hanson-Lenn	0.40	178.00
07/14/25	B320	Prepare Response in Support of Chapter 11 Plan of Liquidation. Samantha Hanson-Lenn	2.40	1,068.00
07/15/25	B320	Review and analyze issues regarding ballots (.4); communications with Miranda Swift and Ben Court regarding same (.1); review and analyze status of adversary proceedings (.4). C.J. Harayda	0.90	508.50
07/16/25	B320	Finalize Response in Support of Plan (.2) and correspondence to and from Committee regarding the same (.2). Samantha Hanson-Lenn	0.40	178.00
07/17/25	B320	Correspondence to and from Committee Members regarding Response in Support of Plan. Samantha Hanson-Lenn	0.10	44.50
07/18/25	B320	Coordinate revising, finalizing, and filing Response in Support (.4); Prepare email correspondence to unsecured creditors' distribution email list regarding Response (.7). Samantha Hanson-Lenn	1.10	489.50
08/05/25	B320	Address plan confirmation issues and circulate emails regarding potential order. Benjamin Court	0.20	113.00
08/06/25	B320	Review Order confirming Plan and analysis and prepare summary to committee regarding the same. Samantha Hanson-Lenn	0.70	311.50



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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
08/07/25	B320	Review updates regarding plan hearing cancellation (.1); review and analyze plan confirmation order and consolidation (.5); prepare update to UCC regarding plan confirmation and next steps (.7); review and respond to follow-up questions regarding same (.5); communications regarding claims transfers and summary of same (.4). C.J. Harayda	2.20	1,243.00
08/11/25	B320	Review updated claims transfer information (.3); communications with debtors counsel on plan implementation and related issues (.2). C.J. Harayda	0.50	282.50
08/12/25	B320	Analyze issues regarding transition of actions and potential litigation to trust (.6); review documents governing same to advise UCC (.3). C.J. Harayda	0.90	508.50
08/13/25	B320	Communications with Debtors counsel regarding effective date items and related transition materials (.3); review and revise correspondence to creditors regarding various questions on confirmation (.3); review additional claim transfers (.1). C.J. Harayda	0.70	395.50
08/14/25	B320	Attend phone conference with counsel for the debtors regarding post-confirmation issues, outstanding litigation issues, division of labor and tasks to accomplish, and discussion of additional litigation targets and strategies (1.3); review emails regarding outcome of multiple summary judgment motions (.2). Benjamin Court	1.50	847.50
08/14/25	B320	Prepare for and meeting with counsel for debtors regarding plan confirmation and trust transition matters (1.3); review and analyze issues regarding pending litigation and potential further claims (1.0); review trust agreement (.2); comms with UCC regarding plan and transitional matters (.4). C.J. Harayda	2.90	1,638.50
08/14/25	B320	Participate in meeting with Debtor's counsel regarding transition to trust after trust agreement is effective. Samantha Hanson-Lenn	1.00	445.00
08/18/25	B320	Prepare for and conference with Epic Committee	2.10	1,186.50

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		regarding plan effective date and related issues (1.3); review status of certain cases and strategy for same (.8). C.J. Harayda		
08/19/25	B320	Review and analyze plan effective date issues and transition (.2); communications with debtors counsel regarding same (.1); review new pleadings filed (.1). C.J. Harayda	0.40	226.00
<b>Total B320 - Plan/Disclosure Statement Incl. Bus Plan</b>			<b>22.00</b>	<b>11,686.00</b>
<b>Current Professional Services</b>			<b>49.20</b>	<b>\$24,956.00</b>

**Task Code Summary**

<b>Task Code</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
B110	Case Administration	1.00	541.00
B120	Asset Analysis and Recovery	7.70	3,723.50
B150	Meetings of and Comm. with Creditors	9.50	4,629.50
B160	Fee/Employment Applications	2.80	1,306.00
B190	Other Contested Matters	5.20	2,602.00
B300	Claims and Plan	0.50	270.50
B310	Claims Administration and Objections	0.50	197.50
B320	Plan/Disclosure Statement Incl. Bus Plan	22.00	11,686.00
<b>Current Professional Services</b>		<b>49.20</b>	<b>\$24,956.00</b>